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December 1, 2003

Jeff S. Jordan, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2003 DEC -8 P 1:16

Dear Mr. Jordan:

Please be advised that we serve as counsel to the Union County Democratic Committee in regard to MUR 5393. A copy of the Statement of Designation of Counsel is enclosed herein.

For the following reasons, we believe no action should be taken against respondent. Since the complaint is in a narrative form, we will respond accordingly.

1. Allegations that Jordan Glatt may or may not have violated 11 CFR 110.1(b) (2002) have no bearing on relevance to charges against the Union County Democratic Committee.
2. Allegations of "straw donors" contributions being accepted by respondent are false.
3. The basis of the argument by complainant boils down to contributions were made by Jordan Glatt to the Union County Democratic Committee and The Union County Committee

with a prior understanding made contributions to the Carden for Congress Campaign. The fact is that the Union County Democratic Committee has historically made contributions to the Democratic candidate for Congress in a district representing large portions of Union County. There was no other arrangement as asserted by complainant.

The substantiation for the allegations centers around a newspaper article attributing comments to a campaign volunteer. The "volunteer" Bryan Burrough is unknown to respondent. No accommodation, as alleged, was ever made.

Union County Democratic Committee has for almost a decade utilized the political consulting firm Message and Media. As such, the large number of checks made payable to the firm are to be expected, and bring no relevance to the complaint, despite the allegation of complainant.

It appears that a local election in Summit did not end on Election Day and the attempt to involve the respondent in the squabble is not appropriate.

As such, we request that a finding be made that no reason exists to believe that the complaint sets forth a possible violation of the act, and accordingly that the file be closed.

Very truly yours,



FRANK G. CAPECE

FGC:rn

STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each respondent.

MUR 5393

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The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Union County Democratic Committee

Print Name

12-1-03

Date

Joseph Bodek

Signature

Treasurer

Title

RESPONDENT'S NAME: Joseph Bodek

ADDRESS: 311 W. Henry Street

Linden, NJ

TELEPHONE: HOME()

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